



PACIFIC
LUTHERAN
UNIVERSITY

Office of the President
Tacoma, WA 98417-0003

253-535-7101 PHONE

253-536-5068 FAX

www.plu.edu

Educating for Lives of
Thoughtful Inquiry, Service,
Leadership and Care

RECEIVED
MAR 2006

Federal Communications Commission
Office of the Secretary

2006 FEB 23 2006 PM 50 P 2:57

04-295

February 23, 2006

The Honorable Kevin J. Martin, Chairman
Federal Communications Commission
445 12th Street NW
Washington, DC 20554

DOCKET FILE COPY ORIGINAL

Dear Mr. Martin:

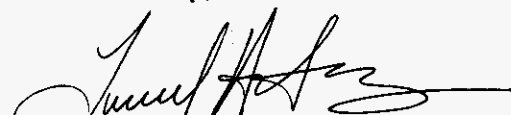
I write to you today to express my deep concern about the FCC's effort to expand the scope of the 1994 Communications Assistance for Law Enforcement Act (CALEA) to include institutions of higher education. Pacific Lutheran University, in the company of many other colleges and universities, would suffer considerable and, in my view, unnecessary hardship if your proposal is fully enabled.

We at PLU likely would need to redesign our network, replace a substantial portion of our network electronic devices, and hire additional staff to accomplish this work in order to become compliant by April 2007. And we would need to accomplish this without financial relief for the undertaking, even as the federal government is reducing its support for higher education in many other arenas.

The higher education community is hard pressed, moreover, to understand the need to extend CALEA coverage to our educational and research networks. Colleges and universities collectively and historically have been highly compliant with law enforcement requests for surveillance in all forms of communication, and there is every reason to believe we will continue to be so in the future.

Thus, given the probable high cost of compliance with CALEA requirements, and the likelihood of very little or no benefit to be derived by law enforcement agencies, I find the proposed extension of CALEA legislation to institutions of higher education to be unnecessary and onerous. I ask that you carefully reconsider your Order of September 23 related to the exemption of educational and research networks from CALEA provisions.

Sincerely,


Loren J. Anderson
President

cc: Higher Education
List ABCDE